



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BAY STATE GAS COMPANY
D.T.E. 05-27

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO BOSTON GAS COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Boston Gas Company ("Boston Gas" or "Company") the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
2. Answers are due July 27, 2004.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Local or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and on all parties; also submit, six (6) copies of the responses to A. John Sullivan, Rates and Revenue Requirement Division, on (1) copy to Claude Francisco, and one (1) copy to Andreas Thanos.
8. In addition to filing, all non-proprietary responses should be submitted by e-mail to A. John Sullivan, dte.efiling@state.ma.us, and to the e-mail address of any party required to be served.

INFORMATION REQUESTS

- DTE-KED-1-1 For each of the years 1993 through 2004, please provide a schedule that shows the following items for the Company:
- (1) the actual amount of write-offs by season and the actual amount recorded on the company’s books for accounting purposes;
 - (2) the actual amount of bad debt by season recovered through the CGAC;
 - (3) the amount of bad debt by season recovered through the base distribution rates;
 - (4) the sum of Items (2) and (3);
 - (5) the percentage of bad debt recovered through the CGAC relative to total bad debt by season and with corresponding annual percentage;
 - (6) firm billed therms and corresponding revenues;
 - (7) estimates of \$ per therm of bad debt; and
 - (8) percentage of total bad debt relative to total revenues.
- Provide a copy of the response in electronic readable medium (compact disk).

- DTE-KED-1-2 For each of the years 1993 through 2004, please provide by rate class, with corresponding company totals, the following items:
- (1) the number of bad debt accounts by season with corresponding annual total;
 - (2) the number of therms by season with corresponding annual total associated with the bad debt accounts in Item (1); and
 - (3) estimates of the \$ per therm cost of bad debt by season with corresponding annual estimates.
- Describe the Company's method and all assumptions used. Provide a copy of the response in electronic readable medium (compact disk).
- DTE-KED-1-3 For each of the years 1993 through 2004 please provide by season, with corresponding annual total:
- (1) estimates of the total annual amount of bad debt, broken down by rate base and CGAC, that would have been recovered by Boston Gas had the company used the method of bad debt recovery approved in Boston Gas Company, D.T.E. 03-40 (2003) using the amount of bad debt and the CGAC revenue to total revenue ratio approved in the company's latest rate case;
 - (2) estimates of the total annual amount of bad debt, broken down by rate base and CGAC, that would have been recovered by Boston Gas had the company used the method of recovery approved in Boston Gas Company, D.P.U. 96-50 (1996);
 - (3) the difference between Items (1) and (2);
 - (4) estimates of the total annual amount of bad debt, broken down by rate base and CGAC, that would have been recovered by Boston Gas had the company used the method of recovery proposed by Bay State Gas Company in D.T.E. 05-27; and
 - (5) the difference between Items (1) and (4).
- Provide supporting schedules and documentation and describe the Company's method including all assumptions used. Provide a copy of the response in electronic readable medium (compact disk).
- DTE-KED-1-4 Has Boston Gas programmed its CRIS billing system to record actual CGA-related bad debt as noted in D.T.E. 03-40 (2003) at 266-267? If yes, please provide the amounts of actual CGA-related and base rate-related bad debt for each month from the time the CRIS billing system was programmed to the latest month of 2005 when data is available.